



san joaquin county & DELTA
WATER QUALITY COALITION

February 15, 2018

Pamela Creedon, Executive Officer
Irrigated Lands Regulatory Program
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Ms. Creedon,

The San Joaquin County and Delta Water Quality Coalition (SJCDWQC) is submitting an addendum to the Comprehensive Groundwater Quality Management Plan (GQMP) submitted on September 26, 2017. The addendum incorporates responses to items identified in the Central Valley Regional Water Quality Control Board's (CVRWQCB) conditional approval of the GQMP, received on January 15, 2018. The Comprehensive GQMP is a required element of the Waste Discharge Requirements General Order for Growers within the San Joaquin County and Delta Area that are members of the SJCDWQC (Order R5-2014-0029-R1). The Comprehensive GQMP incorporates the required elements in the Appendix MRP-1 of the Order and provides the SJCDWQC's strategy for achieving compliance with the WDRs. The GQMP addendum provides additional information about outreach to be used in addressing Items 1, 25, and 26 of the conditional approval letter.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment for violations."

This letter is being mailed with an original signature to the CVRWQCB.

Submitted respectfully,

Michael L. Johnson
SJCDWQC Technical Program Manager

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Comprehensive Groundwater Quality Management Plan Addendum

San Joaquin County and Delta Water Quality Coalition

**Irrigated Lands Regulatory Program
Central Valley Regional Control Board**

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GQMP OUTREACH EFFORTS

The San Joaquin Water Quality Coalition (SJCDWQC or Coalition) communicates with growers via meetings, email, direct mailings, and by posting information on their website. All growers must attend at least one meeting a year in which both surface and groundwater quality issues are discussed. Meetings are held many times each year, often in conjunction with meetings held by the San Joaquin County Agricultural Commissioner or the Contra Costa County Agricultural Commissioner. Additional meetings are held throughout the year as circumstances warrant. The SJCDWQC provides written information to growers throughout the year through mailings, emails, and an annual newsletter in addition to hosting a website (<http://www.sjcdeltawatershed.org/>). The website serves as a clearing house for SJCDWQC activities and outreach on management practices. Information provided through the website is utilized as a supplement to regular grower contacts and meetings.

Outreach Efforts Informing Growers of Legacy Pesticides and “Other Constituents” in Groundwater

As part of the content of the meetings, mailings, email and/or website, the SJCDWQC will include a discussion of legacy pesticides and other constituents present in groundwater within the region, that have exceeded their respective maximum contaminant level (MCL) as described in the Groundwater Assessment Report or based on results from Groundwater Quality Trend Monitoring efforts. A focus will be on preventing the transfer of these legacy constituents from one subbasin to another by the discharge of contaminated tailwater.

Inclusion of “Unused Well” Terminology in Wellhead Protection Management Practices Outreach

As part of the content of the meetings, mailings, email and/or website, the SJCDWQC will include material on well protection of “unused” wells in addition to the discussion of wellhead protection measures and good housekeeping practices for active and abandoned wells.

Early Education and Outreach for Growers whose A/Y Ratios are Statistical Outliers

Members who have submitted an NMP Summary Report for the previous crop year receive a packet of material that summarizes their A/Y information. This N Evaluation Report includes a tabulation of the data submitted by the member, a relative assessment of the member’s A/Y value(s) compared to other members growing the same crop, a comparison of the amount of nitrogen applied compared to other members growing the same crop, identification of which management units are outliers, informational material regarding the definition of an outlier and what it means for the member, and nitrogen removed coefficients (if available). Figure 1 illustrates the timeline from growers submitting NMP Summary Report data, the time period required for data analysis, and when members are informed through meetings and NMP/Survey packets of the results of their nitrogen management practices relative to all growers growing the same crop. The timeline in Figure 1 allows growers to employ the most recent NMP data available for their particular location and crop, within a timely manner.

With the current timelines for distribution and collection of NMP Summary Report data, it is not possible to reduce the time between the collection of the data and the return of the information to the growers.

Informing a member that they farm management units that are outliers and that they must eliminate the problem can cause considerable anxiety and result in the implementation of costly practices. After receiving the NMP Summary Reports from growers in June, the SJCDWQC spends a great deal of time double checking and confirming the data. This quality control step does result in a reasonably large number of adjustments to individual member’s summary reports, often changing their outlier status. Starting in 2018, the SJCDWQC will submit their NMP Summary Report Analysis by November 30; previously the analysis was submitted with the following year’s Annual Report on May 1. Once the data are confirmed and the November report to the Regional Water Board is complete, developing the member packets takes several weeks allowing the Coalition to target January for delivery to members.

Figure 1. Example of timeline for the completion of NMP Summary Reports by Crop Year (CY), outlier analysis, and development of survey packets including the Nitrogen Evaluation Report.

